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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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In re:	: Chapter 11
	:
CIRCUIT CITY STORES, INC.,	: Case No. 08-35653 (KRH)
<u>et al.</u> ,	:
	: Jointly Administered
Debtors.	:
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**RESPONSE AND JOINDER OF JVC AMERICAS CORP. AND JVC COMPANY
OF AMERICA TO DEBTORS' (I) FIFTY-FIRST OMNIBUS OBJECTION TO
CERTAIN 503(b)(9) CLAIMS AND (II) MOTION FOR A WAIVER OF THE
REQUIREMENT THAT THE FIRST HEARING ON ANY RESPONSE
PROCEED AS A STATUS CONFERENCE**

JVC Americas Corp. ("JVC Americas") and JVC Company of America ("JVC Co." and together with JVC Americas, "JVC"), as creditors of the above-captioned debtors (the "Debtors") that hold claims that are the subject of the *Debtors' (I) Fifty-*

First Omnibus Objection To Certain 503(b)(9) Claims And (II) Motion For A Waiver Of The Requirement That The First Hearing On Any Response Proceed As A Status Conference [Docket No. 5214] (the “Objection”), by and through the undersigned counsel, hereby join in, and incorporate as though set forth fully herein as its separate stand alone response, the oppositions to the *Debtors’ (I) Fifty-Second Omnibus Objection To Certain 503(b)(9) Claims And (II) Motion For A Waiver Of The Requirement That The First Hearing On Any Response Proceed As A Status Conference* filed by Paramount Home Entertainment Inc. [Docket No. 5434] and Samsung Electronics America, Inc. (the “Oppositions”) as JVC’s opposition to the Objection. For all the reasons set forth in the Oppositions, the Objection should be denied.

Under the Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of Notice of Omnibus Objections [Docket No. 2881] (the “Omnibus Objection Procedures Order”), a response to an objection is required to contain certain information as follows:

1. Identification of Persons with Knowledge of Facts Relevant to the Response. As the Objection and related brief do not include any information regarding the alleged preferential transfers JVC has purportedly received, JVC cannot identify a person with knowledge of relevant facts. Of course, if the Debtors allege specific facts surrounding the alleged preferential transfers, JVC will supply one or more witnesses.
2. Copies of Documentation. For the same reasons set forth in the prior paragraph, no further documentation, other than the claims of JVC already in the possession of the Debtors, is required at this time.

3. Declaration of Person with Knowledge of Relevant Facts. For the reasons set forth above, no declaration need be (or rationally could be) submitted at this time. Upon notice of any facts in dispute, JVC will provide a declaration of a person with knowledge of such facts.

4. Claimant's Address for Future Notices. Future notices should be sent to the undersigned counsel.

WHEREFORE, JVC respectfully requests (a) that a hearing be held on this Response and (b) the entry of an order (i) denying the Objection, and (ii) granting such other and further relief as the Court deems just and proper.

Dated: November 4, 2009
Norfolk, Virginia

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